



DEPARTMENT OF THE NAVY  
SOUTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
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PLEASE ADDRESS REPLY TO THE  
COMMANDING OFFICER, NOT TO  
THE SIGNER OF THIS LETTER  
REFER TO

5090  
Code 185ND

AUG 05 1992

Ms. Sangsook Choi  
Planning and Assessment Branch  
USEPA Region V  
230 S. Dearborn St.  
Chicago, ILL 60604

Dear Ms. Choi:

Thank you for your thorough review of our CERCLA/SARA Site Inspection Report for NAS Glenview.

Enclosed are our responses to your comments. After your review of our responses, please feel free to call so that we may discuss them.

Contact Ms. Adrienne Townsel Wilson at (803) 743-0582 with any questions regarding this matter.

Sincerely,

  
J. B. MALONE, P.E.  
Head, Installation Branch  
Restoration & Branch

Encl:  
(1) Response Comments

Copy To:  
Nick Stencel, Northern Division  
Ed Wright, Engineers International  
Julia Carter, IEPA  
Chuck Marnell, NAS Glenview

RESPONSE TO USEPA REGION V COMMENTS TO THE DRAFT SITE INVESTIGATION  
FOR NAVAL AIR STATION GLENVIEW

Item 1. Resource Conservation and Recovery Act

This study is being conducted under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) not RCRA. The Navy's Plan of Action including a QAPP and Health & Safety Plan were submitted to Region 5 in the Spring of 1990 as well, as in April 1991. The Navy never received any comments at TRC meetings or otherwise regarding that document, therefore concurrence was assumed.

The background samples were taken at the locations described in Section 3.0 of the Plan of Action (POA). Each Site was to be treated as an individual unit within the base. The location of each background sample was positioned 150 ft to 200 ft away from the sampling area "in a presumably uncontaminated area". The intent as stated on page 4-8 of the POA was to provide a true site specific background sample for comparison against the detection samples that were taken to determine if contamination is indeed present and/or significant. The results of the analytical testing are shown in each site section of the report. The background sample is designated as (Bkg). Background samples were taken at sites 1 through 5. After the chemical analysis was received, it appeared that some of the background samples were taken near contaminated areas. Contaminant concentrations significantly different from the remainder of the background sample were not considered and a representative background for the entire base was created from an average of the remaining samples. The specific procedures used to create the representative background can be provided in greater detail, if required.

It should be noted that the background levels of the organic compounds listed are well below current federal action levels. The compounds were found in the samples listed. A discussion concerning the organic compounds can be found in each site section of the report. Where applicable, the analytical data from each site was compared to the site specific background sample. The detection limits of the instrumentation used in the chemical analysis and the POLs can be provided. A discussion of the laboratories' procedures and the sampling procedures can be found on pages 21 through 29 of the report.

It should be noted that the analytical results for all samples are shown in the laboratory data tables. In order to alleviate any confusion, we propose that the paragraph on page 25 read as follows: "Sample results were typically considered statistically significant if contamination levels were at least three times those in the background samples and it indicates that a potentially verifiable release had occurred within the site."

The sample data tables represent a summary of the analytical results. As stated on page 25 of the report, where the results are shown as a blank, it indicates that the analyte tested for is below the instrument detection limits. All data above the detection limits has been entered with qualifiers as needed. The background results at each site have been included. The detection limits can be added, as needed.

Regarding specific comments:

Site No. 1

As stated in the POA, the sampling plan was based on the recommendations of the Preliminary Assessment (PA). A sampling plan was developed to focus on the areas of concern expressed in the PA and not the entire base. The recommendations given are based on the sampling plan that had been agreed upon and implemented. As stated, the intent of the SI was to help determine which sites warrant a remedial investigation. The conclusions concerning Acetone were based on sampling results.

Site No. 2

As stated in the report in section 2.1.3 Sampling Rationale, the location for the four borings were selected in the vicinity of the group of borings that exhibited the highest contaminant levels during the initial investigation.

In order to determine the presence of groundwater, a common practice is to take water level readings 24 hours after drilling. Due to the expense of drilling, every effort is made to adhere to this practice. The boreholes could not be grouted until the water levels had been obtained. Questioning the adequacy of the sampling is not justified, since in the Chicago area, unexpected storms occur at anytime.

Site No. 6

The sampling rationale and sampling plan are presented in the SI report and the POA. Additional information can be provided concerning the trenching operation.

We agree that the handling of TCE contaminated soils which may exist will need to comply with the applicable regulations.

Site No. 9

As specified in the Preliminary Assessment and Plan of Action, the intent of the Site Inspection at this site was to confirm that the previous PCB contaminated soil remediation had been effective. The investigation was to focus on the past PCB spill area only. Sampling for additional analytes will be appropriate for the on going RCRA site closure.

Surface Water and Sediment Samples

We are in agreement with this comment.

#### Item 2 Underground Storage Tanks

As stated in the report, we recommend that this site be remediated under the NAS LUST program. We agree that as part of this remedial action, a corrective action plan needs to be prepared.

#### Item 3 Surface Water

A schedule can be prepared for the additional study plan and sampling, as required. We agree that this should be coordinated with other remedial investigations that are carried out. The USEPA recommends that the study should also identify the past surface water impacts on the base including all of the sites, and appropriate remediation if necessary. We agree that additional studies concerning the surface water impacts will provide additional information, however due to the amount of reconstruction done at the base, we do not know if the additional data will be useful.

#### Item 4 Background Data

The rationale used to determine background sample locations is stated in the Plan of Action which the EPA had the opportunity to review. Each site was to be treated as an individual unit within the base. The locations of each background sample was positioned 150 ft to 200 ft away from the sampling area "in a presumably uncontaminated area". The intent as stated on page 4-8 of the POA was to provide a true site specific background concentration. The result of the background sample analysis for each location is shown in the specific site section. The method of determining the representative background sample has been discussed previously.

Background samples were not specified in the POA for groundwater, surface water and sediment. As such, these were not included at this phase of the investigation. These backgrounds will be included as required in future investigations.

#### Item 5 Data Quality Objectives (DQOs)

We believe that the DQOs for each group of data collected used the appropriate levels. We have not been provided with Table 1 and cannot comment on the comparison. Engineers International did not perform CLP data validation. For a non-NPL site CLP validation packages are not a requirement. The matrix spikes and matrix spike duplicate samples were collected during the investigation. This information was not tabulated in the report, the hard data forms may be obtained from the labs.

The USEPA CLP SOWs are referenced in the key for Table 1 in Section 1 of the SI report. If further information is required, please specify.

The POA states on page 14-4 that "A portion of ground water samples collected for inorganic (metal) analysis will be field filtered using a pressure filtration device through a .45 micron filter as soon as possible after collection." All samples which were analyzed for VOAs were unfiltered as required.

Item 6 General Comments

The information is sometimes repeated because the original intent was to create a stand alone document for each site. It would not be in the interest of progress to revise the report format, but all future documents will follow the outline recommended by USEPA Region V.